

# Wisconsin's Sharps Collection Program

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Wisconsin was among the first states in the nation to actively promote sharps collection. This publication explains how Wisconsin's program works, how it got started, what difference it has made, what program elements Wisconsin considers to be essential and where to find more information.

## How Wisconsin's program works

Wisconsin's sharps collection program is simple, flexible and voluntary and based on a state law that requires everyone, even individuals at home, to separate sharps from other waste and to dispose of them properly. Here is how it works for the various parties involved:

**Sharps collection stations** may be in pharmacies, healthcare facilities, municipal buildings or any location where the collector volunteers to collect sharps. A station may consist of a secure outdoor kiosk. Visiting medical personnel may collect and transport sharps from their patients.

No one is required to collect sharps. Collectors generally cover the disposal cost as a public service. Collectors may pass on the cost of transportation and disposal to their users, but the station may not make a profit. Some request donations from their users, others receive support from public funds or private donations. The cost of running a station is quite low compared to the cost of dealing with needle stick injuries among waste handlers; therefore, the programs are often funded by the area's waste haulers, whether publicly or privately-owned.

The station operator or sponsoring municipality arranges for the sharps to be treated (disinfected, broken and unable to be reused) before being put in a landfill. Collectors do not need to keep records or use infectious waste manifests.

The only paperwork required is that some sharps collection stations must register with the state to qualify for an exemption from storage facility licensing. Only those who do not also generate sharps, such those collecting sharps in pharmacies or town halls, must register. Sharps collection stations that do generate sharps, such as hospitals, nursing homes and veterinarians, do not need to register and are already exempt from storage facility licensing. However, many of these generator/collectors choose to register because it puts them on the state's list of stations, where potential users can find them. Registered stations must notify the state when they stop accepting sharps.

Since Wisconsin's program began in 1994, over 500 sharps collection stations have registered with DNR. In addition, hundreds of healthcare providers accept sharps from their patients, without having to register. Wisconsin's sharps collection stations range from single locations to networks of dozens of stations serving whole counties.

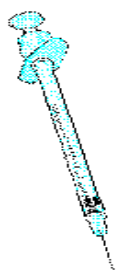
**Generators** who generate less than 50 pounds of sharps per month are allowed to use sharps collection stations. This includes individuals, businesses and institutions. Home generators and others must put their sharps in a safe container, label the container and bring it to a “sharps collection station” for proper disposal. They may not mix containers of sharps with trash or recyclables. Businesses and institutions must keep records of the amounts they generate and where they took their sharps.

**Counties and municipalities** may choose to adopt ordinances about sharps disposal that provide for fines or citations if residents mix sharps with regular trash or with recyclables. This does help promote compliance. Otherwise, the state’s littering law and solid waste statutes apply.

**Wisconsin’s Department of Natural Resources (DNR)** maintains a list of registered sharps collection stations; posts it and guidance for collectors and generators on its website (see “Where can I find out more about sharps collection?” below, for a link to the list). DNR adopted administrative rules about sharps disposal in ch. NR 526, Wis. Adm. Code.

For more details about how the stations operate and descriptions of the wide variety of Wisconsin’s sharps collection stations, see the publication “[Sharps Collection](#)” (publication WA807).

## How did Wisconsin’s sharps collection program get started?



In 1992, a new state statute required DNR to adopt rules for managing and reducing medical waste. Infection control practitioners urged the agency to address the public health issue of sharps in residential waste, as well as business and institutional waste.

Under existing state statutes, DNR could mandate that all generators manage their sharps safely and separately from other wastes. However, existing statutes did not allow DNR to require anyone to collect particular wastes such as sharps. Therefore, any rules for sharps collection could only apply to those who *voluntarily* agreed to collect sharps. Licenses, expense and paperwork were considered to be barriers to potential collectors.

The state’s medical waste rules adopted in 1994 as ch. 526, Wis. Adm. Code, contain provisions to foster sharps collection programs that are safe, convenient, inexpensive, flexible and anonymous. The goal was to reduce injuries to waste haulers and recycling facility workers and the public at large.

Collaboration is the key to starting a statewide sharps collection program. Here are a few of those who contributed to Wisconsin’s success:

- The American Diabetes Association’s Wisconsin chapter helped distribute DNR’s list of sharps collection stations until DNR posted the list on its Web site.
- The Association for Professionals in Infection Control and Epidemiology (APIC) distributed the list to its members annually, who in turn distributed it widely to the public.
- The Wisconsin Veterinary Medical Association, University of Wisconsin Extension and DNR developed brochures and posters for persons generating veterinary sharps.
- Wisconsin’s Department of Health and Family Services promoted sharps collection to public health departments and in its HIV/AIDS prevention newsletter, the *AIDS Update*.
- DNR maintained the list of sharps collection stations and wrote publications.

Local sharps collection programs are also collaborative efforts. For example, the Brown County program, which includes the city of Green Bay, is funded by the public health department; solid waste department; local cities; villages and townships; local waste haulers; and local businesses. The county later developed training materials for starting up sharps collection programs. To purchase these materials, call Judy Friedrichs (920) 448-6404.

# Has sharps collection has made a difference?

Although minimizing red tape also means the state isn't able to quantify results, the program has made a difference. In areas where sharps are collected, people report that fewer sharps are seen in the environment, more waste can be recycled and waste handlers experience fewer injuries, fewer health risks and less emotional trauma.

Fortunately, some municipal collection programs do keep records. Brown County, which includes the city of Green Bay, documented its costs in a published article (see "Where to Find More Information About Sharps" below). The city of Madison started its collection program in 1995 and has had only two documented needlestick injuries among city sanitation workers since then. Dane County and the city of Madison now split the cost of the program (less than \$10,000 per year, combined) for a population of 460,000 in Dane County.

Wisconsin's success has influenced sharps collection in other states as well. DNR staff shared their experiences at the first two meetings of the Coalition for Safe Community Needle Disposal, a national collaboration of businesses, community groups, non-profit organizations and government that promotes public awareness and solutions for safe disposal of needles, syringes, and other sharps in the community. These meetings led to the publication of ["Preventing Bloodborne Infectious through Pharmacy Syringe Sales and Community Sharps Collection"](#).

## What does Wisconsin consider essential to success?

Three components are essential for fostering voluntary sharps collection:

- 1) minimal but effective regulation;
- 2) local initiatives; and
- 3) ongoing education.

These are discussed in an article written for a special supplement to the *Journal of the American Pharmaceutical Association* in 2002 (see the resources, below).

For the benefit of other states or municipalities looking to write regulations, we offer the following advice:

- Require everyone to separate sharps from other waste. Don't exempt anyone from managing sharps safely, do exempt individuals from paperwork, and clarify what is expected and of whom. Wisconsin explicitly exempts households from all medical waste rules except safety requirements related to the separation, packaging, handling, transportation and disposal of sharps. Also, Wisconsin defines "home generators of infectious waste" as persons who self-administer medications or who receive injected medications at home from other members of the household or employees of a homecare or hospice program.
- Encourage voluntary collection of sharps by reducing red tape. Reduce or eliminate requirements for recordkeeping and reporting. Make it easy for collectors to do the right thing without incurring expense. Resist the temptation to require voluntary collectors to report statistics on the amount of sharps collected or costs involved; it will discourage them. Record keeping and reporting will also drive up the cost, which in turn would discourage people from using the program. Wisconsin exempts sharps collection stations from keeping records and using infectious waste manifests.
- Exempt collectors from storage facility licensing. If necessary, change any waste management regulations that require a person to have a license or permit to store waste generated by others. Wisconsin explicitly exempts those who store sharps generated by others from being licensed as solid waste storage facilities.

- Keep regulations simple and flexible. Allow the voluntary collectors to set up their programs to meet local needs, from single locations to networks of dozens of stations. In addition to enabling municipalities, healthcare providers and pharmacies to collect sharps, Wisconsin's requirements are flexible enough to enable sharps collection through kiosks, traveling medical personnel, syringe exchange programs, diabetic support groups, fire stations and private businesses – without mentioning all the options.
- Allow persons to possess syringes and needles. The combination of lack of penalties and syringe exchange programs can minimize public health risks for everyone. Wisconsin has no legal penalties for possession of these items; therefore illicit drug users are not motivated to quickly discard their sharps in the environment, down storm sewers, etc.
- Impose consequences for improper disposal. Adopt statutes or rules to allow you to impose fines or citations to promote compliance with the "no sharps in the trash" requirement. Wisconsin is unable to do this, except under its littering law. Some Wisconsin municipalities and counties have adopted ordinances and monetary fines and, where these exist, compliance is improved.
- Educate the public frequently. Post information on your state or local Web sites. Issue periodic press releases about the proper management of sharps. Notify doctors, public health nurses, pharmacists, infection control practitioners, diabetic support services, veterinarians, home care services, the hospitality sector and others of their opportunity to do something about a real public health risk. Partner with diabetes associations to get the word out to individuals. Consider the needs of persons who are disabled or homebound, are drug addicts or are not fluent in English.
- Offer assistance to start collection programs. Provide start-up funds to encourage people to begin collecting sharps. After start-up, these programs cost very little, and can pay for themselves by avoiding expenses of needlestick injuries among waste handlers. Wisconsin was unable to do this, but many people requested assistance.

And last but not least, contact the Coalition for Safe Needle Disposal for support. See “Where can I find out more about sharps collection?” below, for the Coalition’s website address.

## Where exactly are Wisconsin’s regulations about sharps?

Wisconsin’s medical waste rules are compiled on our Web site at <http://dnr.wi.gov/topic/Waste/Laws.html>. Those relating to sharps collection are:

Minimum safety-related requirements that apply to all generators of sharps:

Separating waste	NR 526.06
Containing infectious waste	NR 526.07
Handling infectious waste	NR 526.08
Storing and transferring infectious waste	NR 526.09 (4)
Transporting and shipping infectious waste	NR 526.10 (3)
Treating infectious waste	NR 526.11 and 526.12 (4)
Disposing of infectious waste	NR 526.13
Exemption for household generators	NR 526.04 (2)
Exemption for sharps collection stations	NR 526.09 (2) (c)
Exemption for medical facilities accepting sharps	NR 526.09 (2) (b)
Requirements for sharps collection stations	NR 526.09 (5)
Items presumed to be infectious sharps	NR 526.05 (1) (a)
Definition of ‘sharps’	NR 500.03 (209)
Definition of ‘home generator of infectious waste’	NR 500.03 (102)

# Where can I find out more about sharps collection?

## DNR Resources

**Medical waste web pages** <http://dnr.wi.gov/topic/HealthWaste/>

Includes Web pages about sharps disposal and sharps collection.

**Medical waste publications** [http://prodoasext.dnr.wi.gov/inter1/pk\\_wm\\_doc\\_public\\$.startup](http://prodoasext.dnr.wi.gov/inter1/pk_wm_doc_public$.startup)

Sharps Collection (guidance for collectors) WA 807

Disposing of Household Sharps (for generators) WA 804

WI Laws on Animal Medical Waste (for generators) WA 840

**List of registered sharps collection stations** <http://dnr.wi.gov/topic/waste/licenses.html>

This Web page also has a list of licensed infectious waste haulers.

**Wisconsin's medical waste rule** <http://www.legis.state.wi.us/rsb/code/nr/nr526.pdf>

**DNR medical waste coordinator** Call 608/266-2111 or send e-mail to [DNRMedicalWaste@wisconsin.gov](mailto:DNRMedicalWaste@wisconsin.gov)

## Other resources:

**"How Wisconsin Promotes Household Sharps Collection"** in *"Preventing Bloodborne Infectious through Pharmacy Syringe Sales and Community Sharps Collection,"* a supplement to the Journal of the American Pharmaceutical Association, November/December 2002, Vol. 42, No. 6, Suppl. 2, pp. S111-S112.

<http://japha.org/article.aspx?articleid=1035723&resultClick=3>

**"Household Sharps Collection Program in Brown County, Wisconsin"** in *"Preventing Bloodborne Infectious through Pharmacy Syringe Sales and Community Sharps Collection,"* a supplement to the Journal of the American Pharmaceutical Association, November/December 2002, Vol. 42, No. 6, Suppl. 2, pp. S113-S114.

<http://japha.org/article.aspx?articleid=1035727&resultClick=3>

**The Coalition for Safe Community Needle Disposal** The Coalition is a collaboration of businesses, community groups, non-profit organizations and government that promotes public awareness and solutions for safe disposal of needles, syringes and other sharps in the community. <http://www.safeneedledisposal.org/>

**Product Stewardship Institute (PSI)** PSI is fostering a multi-stakeholder dialogue on the medical sharps issue. Participants will explore ways to educate those using sharps about the problem, provide convenient access to a safe collection system, change behavior to increase compliance and develop a cost-effective system that is financially sustainable. <http://www.productstewardship.us/>

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